

EXHIBIT F

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A “EDDY GRANT”, GREENHEART MUSIC LIMITED, a United Kingdom Limited Company, and GREENHEART MUSIC LIMITED, an Antigua and Barbuda Limited Company,

Plaintiffs,

- against -

DONALD J. TRUMP and DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendants.

Civil Action No. 1:20-cv-07103-JGK

**DECLARATION OF
WALLACE E.J. COLLINS, III, ESQ**

I, Wallace E.J. Collins, III, declare as follows:

1. I am an attorney at law duly admitted to practice before the Courts of this State. I submit this Declaration as part of plaintiffs Edmond Grant p/k/a “Eddy Grant” (“Grant”), Greenheart Music Limited, a United Kingdom Limited Company (“Greenheart UK”), and Greenheart Music Limited, an Antigua and Barbuda Limited Company (“Greenheart Antigua” and together with Grant and Greenheart UK, “Plaintiffs”) Supplemental Responses and Objections to Defendants’ Donald J. Trump (“Trump”) and Donald J. Trump for President, Inc. (“Trump for President,” and together with Trump, “Defendants”) Third Set of Interrogatories to Plaintiffs [Nos. 13-14] (the “Responses”). I have personal knowledge of the facts and circumstances set forth herein.

2. I have been Mr. Grant’s transactional counsel since about 1995.

3. On August 13, 2020, I received a telephone call from Mr. Grant concerning Defendants' use of an excerpt of "Electric Avenue" in a campaign video that was posted on Twitter by Defendant Trump.

4. That same day I sent a takedown notice to Twitter. Proof of my communications with Twitter have been produced in this action as GRANT0288-0294.

5. I also drafted a cease and desist letter (the "August 13th Letter" or "Letter") to demand that Defendants remove the tweet and video from their social media accounts. The August 13th Letter has been produced in this action as GRANT0150. I searched the internet for an address for President Trump and/or Trump for President to mail the Letter. I do not recall searching for the name of a specific individual to mail the Letter to on behalf of Trump for President.

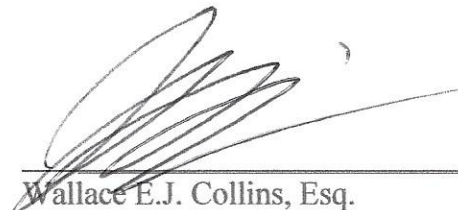
6. I sent Mr. Grant a copy of the executed version of the August 13th Letter.

7. I also mailed the August 13th Letter by regular mail after leaving my office on 250 East 39th Street, New York, NY 10016 and placing the Letter in a United States Postal Service collection box designated for outgoing mail between 39th and 40th street on Third Avenue. I routinely use that collection box for my business mail.

8. I did not use any tracking or verification delivery method for the August 13th Letter, but the Letter was never returned as undeliverable.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 3, 2022



Wallace E.J. Collins, Esq.